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Attorney for Plaintiff Juan Ramirez

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Juan C. Ramirez, an individual,

Plaintiff,

vs.

Professional Collection Consultants, a  
corporation; Robert F. Henry, Esq., an  
individual,

Defendants.

Case No.

COMPLAINT

COMES NOW PLAINTIFF JUAN C. RAMIREZ, and respectfully submits  
his complaint as follows:

**JURISDICTION**

1. This is an action under the Fair Debt Collection Practices Act, (hereinafter "FDCPA"), 15 U.S.C. § 1692a *et seq.*, which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices. Jurisdiction in this case arises under 28 U.S.C. § 1331 and is founded upon 15 U.S.C. § 1692k which grants the United States District Courts jurisdiction to hear this action without regard to the amount in controversy.

## THE PARTIES

2. Plaintiff Juan Ramirez (hereinafter "Plaintiff"), a natural person, is an adult and a consumer as defined by the FDCPA, 15 U.S.C. § 1692a(3). Upon information and belief, Defendant Professional Collection Consultants, Inc. (hereinafter "Defendant PCC") is a California corporation doing business within this judicial district that is engaged in the business of collecting debts in the State of California.

3. Upon information and belief, Defendant PCC is a debt collector as defined by the FDCPA, 15 U.S.C. § 1692a(6), because upon information and belief, Defendant collects, or attempts to collect, debts incurred, or alleged to have been incurred, for personal, family, or household purposes using the U.S. Mail, telephone and internet.

4. Upon information and belief, Robert F. Henry (hereinafter "Defendant Henry") is a licensed California attorney who is a salaried employee of Defendant PCC.

5. Upon information and belief, Defendant Henry serves as in-house legal counsel for Defendant PCC.

## FACTUAL ALLEGATIONS

6. During the month of August 2012, Plaintiff received written correspondence from Defendant Henry, dated August 24, 2012, in which Defendant Henry identified himself as in-house legal counsel for Defendant PCC, and in which Defendant Henry made a demand for monies alleged to be owed by Plaintiff to Defendant PCC. Defendant Henry's letter further stated that, "This communication is from a debt collector. This is an attempt to collect a debt. Any information obtained will be used for that purpose."

7. On or about September 1, 2012, Plaintiff notified Defendant PCC in writing that Defendant PCC is to have no further contact with Plaintiff except as allowed under the FDCPA. Plaintiff further requested that Defendant PCC provide

1 him with validation of the alleged debt, and provided a return address to which such  
2 validation should be sent. The above-referenced return address was 9167 Kester  
3 Avenue, Panorama City, California.

4 8. During the month of September 2012, Plaintiff received written  
5 correspondence on Defendant PCC's letterhead, dated September 5, 2012, and  
6 addressed to Plaintiff at the Kester Avenue address that Plaintiff had previously  
7 provided to Defendant PCC. Defendant PCC's letter made reference to Plaintiff's  
8 letter of September 1, and enclosed documents which purported to fulfill Plaintiff's  
9 prior request for validation of the alleged debt.

10 9. On or about September 9, 2012, Defendant PCC, through its counsel  
11 Defendant Henry, filed a collection lawsuit against Plaintiff for the above-referenced  
12 alleged debt in Los Angeles County Superior Court, case number 12E09106.

13 10. Despite having actual notice of Plaintiff's address, and despite having  
14 corresponded with Plaintiff at Plaintiff's Kester Avenue address, on or about  
15 February 28, 2013, Plaintiff was allegedly served with the summons and complaint  
16 for the above-referenced state lawsuit by and through substituted service, at 14941  
17 Roscoe Boulevard, Apartment 107, Panorama City, California.

18 11. Plaintiff in fact did not reside at the Roscoe Boulevard address at which  
19 Defendant PCC's process server purportedly effected substituted service. Further,  
20 Plaintiff had in fact never resided at the Roscoe Boulevard address, and had no  
21 familial or other connection to that address, and had in fact never visited that  
22 location.

23 12. On or about March 14, 2013, Defendant PCC, by and through its  
24 attorney, Defendant Henry, caused the Proof of Service documents to be filed with  
25 the Los Angeles Superior Court, and commenced litigation against Plaintiff, despite  
26 plaintiff having no notice of the lawsuit.

27 //

28 //

1           13.   Some time prior to April 8, 2013, Plaintiff became aware of Defendant  
2 PCC's lawsuit quite by chance, when counsel for Plaintiff discovered it in the course  
3 of representing Plaintiff on an unrelated matter.

4           14.   After informing Plaintiff of Defendant PCC's lawsuit, Plaintiff  
5 immediately retained current counsel to represent his interests in the state court  
6 matter. Plaintiff's counsel was able file an answer with the court before a default  
7 judgment could be obtained.

8           15.   But for the chance discovery of Defendant PCC's lawsuit by Plaintiff's  
9 counsel, it is likely that a default judgment would have been taken against Plaintiff,  
10 and that Plaintiff's first actual notice of the lawsuit would have been in the form of  
11 a wage garnishment notice.

12           16.   California Code of Civil Procedure § 415.20 allows substituted service  
13 by leaving a copy of the summons and complaint at the "person's dwelling house,  
14 usual place of abode, usual place of business, or usual mailing address..."

15           17.   Because Defendants PCC and Henry had actual knowledge of  
16 Plaintiff's mailing address from having previously corresponded with him,  
17 Defendants PCC and Henry knew that Plaintiff's "usual place of abode...or usual  
18 mailing address," was the Kester Avenue address. In spite of having actual notice  
19 of Plaintiff's "usual mailing address," Defendants elected to carry out improper  
20 substituted service at an address at which Plaintiff had never lived. Defendants  
21 further elected to cause the above-referenced Proof of Service documents to be filed  
22 with the Los Angeles Superior Court.

23           18.   In commencing litigation in an attempt to collect a consumer debt while  
24 knowing that Plaintiff had not been served, Defendants PCC and Henry used false,  
25 deceptive, and misleading means to collect a debt, in violation of 15 U.S.C § 1692e  
26 and 15 U.S.C § 1692e(10).

27 //

28 //

1 19. Through this conduct, Defendant PCC, by and through Defendant  
2 Henry, used an unfair or unconscionable means to attempt to collect a debt, in  
3 violation of 15 U.S.C § 1692f.

4 20. As a result of the acts alleged above, Plaintiff suffered actual damages  
5 in the form of anxiety, embarrassment, humiliation, anger and frustration, which has  
6 negatively affected Plaintiff's concentration in performing his job in a demanding  
7 occupation and which has negatively impacted his personal relationships.

8 21. As a result of the acts alleged above, Plaintiff has suffered further actual  
9 damages in the form of attorneys' fees and costs incurred in the course of defending  
10 Plaintiff from the improperly brought state court debt collection action.

11 **FIRST CLAIM FOR RELIEF**

12 (For FDCPA Violations against all Defendants)

13 22. Plaintiff repeats and realleges and incorporates by reference all other  
14 paragraphs.

15 23. Defendants PCC and Henry violated the FDCPA. Defendants'  
16 violations include, but are not limited to each and every one of the above-cited  
17 provisions of the FDCPA, 15 U.S.C. § 1692 et seq.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff respectfully prays that judgment be entered in  
20 Plaintiff's favor and against Defendants for the following:

- 21 A. Actual damages to pursuant 15 U.S.C. § 1692k(a)(1);  
22 B. Statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(A);  
23 C. Costs and reasonable attorney's fees pursuant to 15 U.S.C. §  
24 1692k(a)(3); and  
25 D. For such other and further relief as may be just and proper.

26 DATED: February 25, 2014

27   
28 Mark T. McClenning  
Attorney for Plaintiff  
Juan Ramirez



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge John A. Kronstadt and the assigned Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

CV14-1485-JAK(MANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

February 27, 2014

Date

By C. Sawyer

Deputy Clerk

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NOTICE TO COUNSEL

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

**Subsequent documents must be filed at the following location:**

☒ Western Division  
312 N. Spring Street, G-8  
Los Angeles, CA 90012

☐ Southern Division  
411 West Fourth St., Ste 1053  
Santa Ana, CA 92701

☐ Eastern Division  
3470 Twelfth Street, Room 134  
Riverside, CA 92501

**Failure to file at the proper location will result in your documents being returned to you.**

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

Juan C. Ramirez, an individual,

Plaintiff(s)

v.

Professional Collection Consultants, a corporation;  
Robert F. Henry, Esq., an individual,

Defendant(s)

CV14-1485 JAK (MAN)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Professional Collection Consultants, a corporation, 6700 S. Centinela Ave., 3rd floor,  
Culver City, CA 90230;  
Robert F. Henry, Esq., an individual, 6700 S. Centinela Ave., 3rd floor, Culver City, CA  
90230.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Mark T. McClenning,  
Attorney at Law  
10808 1/2 Huston Street  
North Hollywood, CA 91601

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: 02/27/2014

CLERK OF COURT



Signature of Clerk or Deputy Clerk

1149

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEETI. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

Juan C. Ramirez, an individual

DEFENDANTS (Check box if you are representing yourself ☐)Professional Collection Consultants, a corporation;  
David F. Henry, Esq., an individual(b) County of Residence of First Listed Plaintiff Los Angeles

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Los Angeles

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

Mark T. McClenning, CA SBN 206177  
10808 1/2 Huston St.  
N. Hollywood, CA 91601  
Telephone: (818) 392-8599

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

## II. BASIS OF JURISDICTION (Place an X in one box only.)

☐ 1. U.S. Government Plaintiff☒ 3. Federal Question (U.S. Government Not a Party)☐ 2. U.S. Government Defendant☐ 4. Diversity (Indicate Citizenship of Parties in Item III)III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. ORIGIN (Place an X in one box only.)

☒ 1. Original Proceeding
 ☐ 2. Removed from State Court
 ☐ 3. Remanded from Appellate Court
 ☐ 4. Reinstated or Reopened
 ☐ 5. Transferred from Another District (Specify)
 ☐ 6. Multi-District Litigation
V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check "Yes" only if demanded in complaint.)CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No MONEY DEMANDED IN COMPLAINT: \$

## VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Fair Debt Collection Practices Act, ("FDCPA"), 15 U.S.C. § 1692a et seq., which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

## VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<b>Habeas Corpus:</b>	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b>	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	<b>TORTS</b>	<b>PERSONAL PROPERTY</b>	<input type="checkbox"/> 530 General	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 371 Truth in Lending	<b>Other:</b>	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	<b>BANKRUPTCY</b>	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<b>FORFEITURE/PENALTY</b>	<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<b>REAL PROPERTY</b>	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<b>LABOR</b>	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 790 Other Labor Litigation	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	



**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court?	STATE CASE WAS PENDING IN THE COUNTY OF:	INITIAL DIVISION IN CACD IS:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Los Angeles	Western
If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action?	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**C.1. Is either of the following true? If so, check the one that applies:**

- ☐ 2 or more answers in Column C  
☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the  
 SOUTHERN DIVISION.  
 Enter "Southern" in response to Question D, below.  
 If none applies, answer question C2 to the right. →

**C.2. Is either of the following true? If so, check the one that applies:**

- ☐ 2 or more answers in Column D  
☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the  
 EASTERN DIVISION.  
 Enter "Eastern" in response to Question D, below.  
 If none applies, go to the box below. ↓

Your case will initially be assigned to the  
 WESTERN DIVISION.  
 Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Western

**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**IX(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY**

**(OR SELF-REPRESENTED LITIGANT):** \_\_\_\_\_

*Maest McCann*

DATE: 02/26/2014

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))